

**COMMONWEALTH OF MASSACHUSETTS**  
**Department of Telecommunications and Energy**

**RESPONSE OF THE ATTORNEY GENERAL TO THE  
SECOND SET OF INFORMATION REQUESTS FROM THE  
BAY STATE GAS COMPANY  
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-11            Please refer to the Cavallo Testimony at 3, lines 21-23. Please define  
“industrial surface preparation and painting.”

Response:            As commonly used, the term “industrial surface preparation and painting”  
refers to the cleaning and roughening of industrial substrates (such as carbon steel and concrete)  
in controlled fashions, and application of high-performance paints and coatings to prepared  
substrates.